

UNITED STATES DISTRICT COURT

for the
District of Oregon

FILED 01 FEB '19 15:27 USDC-ORP

In the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)The Cellular Telephone Assigned
Call Number (562) 388-4830

Case No. 19-MC-74

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See Attachment A hereto (this court has authority to issue this warrant under 18 U.S.C. §§ 2703(c)(1)(A) and 2711(3)(A) and Federal Rule of Criminal Procedure 41),

located in the Central District of California, there is now concealed (identify the person or describe the property to be seized):

See Attachment B hereto.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
☒ contraband, fruits of crime, or other items illegally possessed;
☒ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	Offense Description
18 U.S.C. §§ 2, 371, 1952, and 2421	criminal conspiracy to transport individuals in interstate commerce with the intent to have them engage in prostitution and using a facility in interstate commerce with intent to promote an business enterprise engaged in illegal prostitution.

The application is based on these facts:

See affidavit of FBI Special Agent June Piniewski which is attached hereto and incorporated herein by this reference.

- ☒ Continued on the attached sheet.
☒ Delayed notice of 30 days (give exact ending date if more than 30 days:) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Sworn via telephone pursuant to Fed.R.Crim.P. 4.1
on 12/27/2018 at 5:09 pm. - YYY

Applicant's signature

June Piniewski, Special Agent, FBI

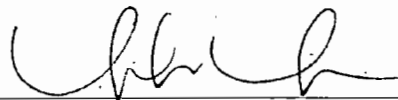
Printed name and title

via telephone

Sworn to before me and signed in my presence.

Date: 12/27/2018

City and state: Portland, Oregon



Judge's signature

Hon. Youlee Yim You, United States Magistrate Judge.

Printed name and title

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

)
) ss. AFFIDAVIT OF JUNE PINIEWSKI
)

I, June Piniewski, being first duly sworn, depose and say:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent of the United States Department of Justice, Federal Bureau of Investigation (FBI), and have been so employed since February 2015. As a Special Agent of the FBI, I am authorized to investigate violations of the criminal laws set forth in Title 18 of the United States Code. I am currently assigned to the Portland Division of the FBI where I investigate violations of federal law, including bank robberies, crimes against children, sex trafficking offenses, and other violent crimes. I have been involved in multiple investigations of matters involving sex trafficking, particularly as it relates to violations of 18 U.S.C. §§ 1591, 1952, 2421 and 2423. I have had extensive training in law enforcement investigation techniques, including but not limited to 800 hours of training at the FBI's Academy at Quantico, Virginia. Prior to joining the FBI, I was a Deputy Sheriff in Hillsborough County, Florida, for approximately five years.

2. As a Special Agent of the FBI, I am authorized to investigate violations of the criminal laws set forth in Title 18 of the United States Code. I am currently assigned to the Portland Division of the FBI where I investigate violations of federal law, including bank robberies, crimes against children, sex trafficking offenses, and other violent crimes. I have been involved in multiple investigations of matters involving sex trafficking, particularly as it relates to violations of 18 U.S.C. § 2421. I have had extensive training in law enforcement investigation

Affidavit of Special Agent June Piniewski

techniques, including but not limited to 800 hours of training at the FBI's Academy at Quantico, Virginia. Prior to joining the FBI, I was a Deputy Sheriff in Hillsborough County, Florida, for approximately five years, where I participated in the investigation of various crimes, including violent crimes.

Purpose of the Affidavit

3. This I submit this affidavit in support of an application for a search warrant under Rule 41 of the Federal Rules of Criminal Procedure and 18 U.S.C. §§ 2703(c)(1)(A) and 2711(3)(A) for information about the location of the cellular telephone assigned call number **(562) 388-4830**, whose service provider is Sprint (hereinafter also referred to as "Provider"), a wireless telephone service provider headquartered at 6480 Sprint Parkway Overland Park, KS 66251, as described in Attachment A hereto. The cellular telephones assigned call number **(562) 388-4830** are hereinafter referred to as the **Target Cell Phone**. As explained below, I believe there is probable cause to obtain the location information and other information as described in Attachment B hereto.

4. The information set forth in this Affidavit consists of information I gathered and observed through my direct participation in this investigation, as well as information relayed to me by other law enforcement personnel. The information set forth in this affidavit is not intended to detail each and every fact and circumstance of the investigation, or all information known to me or the investigative participants. Rather, this affidavit serves solely to establish that there is probable cause to conclude that the data sought will yield evidence of the crimes that we are investigating.

5. Based on the facts set forth in this affidavit, there is probable cause to believe that **Yan Wang** is just one of the many individuals engaged in criminal conspiracy to knowingly transport individuals in interstate and foreign commerce with intent that such individuals engage in prostitution and who are using a facility in interstate commerce with the intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment, and carrying on of a business enterprise engaged in unlawful prostitution activities, in violation of Title 18, United States Code, Sections 2, 371, 1952, and 2421. I also have probable cause to believe that the location information of the Target Cell Phone as described in Attachment B will constitute evidence of these criminal violations and will lead to the identification of other individuals who are engaged in the commission of these offenses.

Statement of Probable Cause

Sex Trafficking

6. I have received formal and on-the-job training in the investigation of sex trafficking. I have participated in several investigations, which led to the arrest and conviction of traffickers, and have become familiar with the habits, mannerisms, language, and techniques used in committing human trafficking offenses, and the attempts to conceal the evidence of such occurrences from detection by both the public at large and law enforcement agencies. I have spoken with and read documentation by officers who possess knowledge and expertise in the investigation of sex trafficking-related crimes. I have spoken to numerous victims of sex trafficking about their experiences in the life of prostitution. I have also participated in many aspects of sex trafficking investigations, including conducting physical surveillance, interviews,

reviewing electronic evidence, using confidential human sources, writing and executing search and seizure warrants, and making arrests. I have gained knowledge of the inner working of Sex Trafficking Organizations (STOs) and based on my training and experience know the following:

7. Prostitution is inherently a cash business, as cash provides paying customers with some form of anonymity. STOs often move and launder the cash by placing it into bank accounts, using casinos to launder sources of cash, wire transfers, store value credit/debit cards, on-line e-currency, investment accounts, real estate, cash based businesses such as restaurants, and other types of assets. STOs will often move the illegal proceeds several times through different forms of assets to make it difficult for law enforcement to discover the true source of the funds. STOs will often open legitimate businesses or have legitimate employment to launder the illegal proceeds and commingle these illegal funds with legitimate income from the business or employment, to prevent law enforcement from discovering the true source of the proceeds.

8. Websites such as, www.backpage.com, www.adultsearch.com, www.supermatchescort.com, www.portlandasianescort.com and others are often used by STOs to advertise commercial sex services. I know that STOs will often advertise their services as "massages" or "escorts" to avoid detection by law enforcement. The term "escort" is widely used as a euphemism for prostitution. I know that a legitimate "escort" is hired for an extended period of time such as several hours and even days. An "escort" is expected to be attractive and presentable in public. They are often used to stand-in as a date for specific functions or entertainment for an evening. "Escorts" are paid for their time and their company and sexual favors are not included as part of their package. Legitimate "escorts" or "massage" parlors do not list coded language for the services they provide such as: GFE (Girlfriend Experience) or

BBJ (Bare Blowjob). I also know that legitimate “escorts” or “massage” parlors do not typically advertise services posting sexually provocative photographs or by providing age, height or the weight of the person providing the massage. Legitimate “escort” and “massage” businesses typically do not operate from a motel room paid on a day by day basis, nor from an apartment. I also know legitimate “escorts” and “masseuses” do not perform sexual acts on their customers and therefore do not provide condoms or wear lingerie when interacting with the customer.

9. The STOs post on-line ads for “escorts” or “massages” that investigators recognize as prostitution related advertisements. The investigation has revealed the following roles within a STO:

Customers – men who pay money for sexual acts

Providers – individuals who perform sex acts for money

Drivers – individuals who transport the providers and perform other activities, such as: collecting proceeds, delivering food and other supplies

Leasee – individuals who lease the apartments that are used as brothels

Dispatcher – individuals who answer the calls/texts/emails (responses to ads) from the customers and sets up “dates” within the computer and notifies the provider

Boss – a supervisor of one or more brothel locations

10. Through this investigation, I have learned how STOs manage operations of the on-line ads. When a customer responds to the ad and calls the number associated with the ad they are connected to “dispatch.” Dispatch identifies the location of the customer and assigns the customer to a specific provider (someone who performs sex acts for money) for a “date” (an

encounter for the purposes of engaging in a commercial sex act with the women). Dispatch then notifies the provider that a "date" has been set.

11. STOs arrange apartments and hotels for the provider to stay in and use for engaging in acts of prostitution. As part of the investigation, over twenty undercover sting operations have been conducted in Portland, Oregon targeting Asian "escort" ads. In these sting operations, an undercover officer sets up a "date" using the contact phone number provided in the ad. Once the date is confirmed and an address is provided, the undercover officer is told to notify dispatch when they have arrived. Once the undercover has arrived, dispatch will provide the motel room number or apartment number.

12. Once inside the apartment, investigators notice very little furniture and that the bedroom in the apartment appears to be only used for sex acts. There rarely is a bedframe and the mattress has a sheet with a towel laid on top. The nightstands next to the bed usually have multiple unused condoms on or near them, towels, and various bottles of oils and lubricants. The clothing in the closets or in the suitcases consist of mainly of lingerie.

13. The women are being recruited to work as providers for these STOs from their respective countries (generally China or other Asian countries) and generally speak very little English. Some providers have indicated they are engaging in prostitution to pay back certain costs, such as the cost of coming into the United States.

Chen STO

14. For the past two years I have been investigating sex trafficking, mainly focused on Asian STOs. As the investigation unfolded, I learned multiple agencies (both local and federal) across the country have encountered Asian STOs. The investigation has revealed an

international sex trafficking organization (hereafter referred to as the "Chen Organization") operating throughout the United States, Canada, and Australia. Zongtao Chen is suspected of facilitating and coordinating the interstate and foreign travel of mainly Chinese national females (CNF) for criminal sexual activity and using on-line websites to promote prostitution such as "supermatchescort.com."

14. Between June 16, 2016 and July 10, 2016, the FBI received approximately 19 anonymous tips submitted to Crime Stoppers of Oregon that identified Zongtao Chen, aka Mark Chen, as a facilitator for an Asian STO operating in Canada and the United States. Chen is specifically named as the renter of several hotels and condominiums used by the STO in the United States and Canada.

15. One tip on June 16, 2016, read, "International prostitution ring operating in Portland. When will you shut down this operator? They offer unprotected sex acts. 1,000's of people are at health risk. Hotels and short term condo rentals is the way they do business. Mark Chen from Toronto may have a hand in the condo part of the business. He is a real estate broker. Advertisement today in Backpage: *Portland Asian Escort* Best Asian student *New Kelly 34DD*-19. Come to enjoy the best Asian experience, new Kelly, 19, 34DD, 100lbs, she will rock your world. Portland Downtown in call 503-850-2545 or 647-687-7096, WeChat: aa585466383 www.nyasianangels.com."

16. Another tip received on June 23, 2016, read, "Some tips for the international prostitution ring operating in your city: Mark Chen is a real estate broker from Toronto. Leader? Tenant Name: Zong Tao Chen (aka Mark Chen) Contact Phone Number 416-732-4321. Numbers used: WeChat: aa5854660383, call or text: 206-866-6735, call or text: 323-498-1660

347-594-5090, call or text: 503-850-2545 520-433-9310.....", with several other phone numbers and addresses listed.

WeChat and CHS

17. The Chen STO mainly uses a mobile application called, "WeChat," to communicate, advertise, and send money. WeChat is a Chinese multi-purpose messaging, social media and mobile payment application. WeChat provides text messaging, hold-to-talk voice messaging, broadcast (one-to-many) messaging, video calls and conferencing, video games, sharing of photographs and videos, and location sharing. It can exchange contacts with people nearby via Bluetooth. It can also integrate with other social networking services such as Facebook and QQ (a Chinese instant messaging service that provides online social games, music, shopping, microblogging, movies, and group and voice chats). Photographs may also be embellished with filters and captions, and an automatic translation service is available. WeChat supports different instant messaging methods, including text message, voice message, walkie talkie and stickers. Users can send previously saved or live pictures and videos, name cards of other users, coupons, or current GPS locations with friends either individually or in a group chat. WeChat users can set up a WeChat account by entering their phone number and then their Username or ID. Users can customize their profile by adding a profile image which is displayed during a conversation.

18. WeChat users who have provided bank account information may use the application to pay bills, order goods and services, transfer money to other users, and pay in stores if the stores have WeChat payment options. Users can link their Chinese bank accounts, as well

as Visa, MasterCard and Japan Credit Bureau. WeChat Pay is a digital wallet service incorporated into WeChat, which allows users to perform mobile payments and send money between contacts. Although users receive immediate notification of the transaction, the WeChat Pay system is not an instant payment instrument, because the funds transferred between counterparties is not immediate. Every WeChat user has their own WeChat Payment account. Users can acquire a balance by linking their WeChat account to their debit card, or by receiving money from other users. Users who link their credit card can only make payments to vendors, and cannot use this to top up WeChat balance. WeChat Pay can be used for digital payments.

19. A Confidential Human Source (CHS) who I have met with, whose true identity I know, came to the attention of the FBI from an investigation conducted by Homeland Security Investigations (HSI), Omaha Division. This investigation involved a particular STO using Extended Stay motels for the women. One of the subjects within their investigation was the CHS. The CHS, who speaks Mandarin Chinese, worked within the STO and organized the hotels and “dates” for the providers in exchange for a portion of the money collected from the commercial sex acts. The CHS agreed to cooperate in the investigation of others involved in criminal activity in the hopes of future consideration. The CHS has no formal charges pending. The CHS has previously been arrested for a few misdemeanor prostitution charges and one felony prostitution related charge.

20. On May 31, 2018, I met with the CHS who told me that a man named “Mark” has several brothels in multiple cities across the United States and Canada. In 2018, while working as a dispatcher for an unrelated STO, the CHS contacted Mark via WeChat to see if he would help find work for the providers. During this conversation, Mark suggested certain cities where

the CHS' providers could work and the expected number of customers available daily in these locations.

21. Also on May 31, 2018, the CHS directed me to website, "ca.51." The website was mainly in Chinese, but at the top left was the word, "Canada" in English. In the middle of the website was a picture of an Asian male with glasses and next to the picture it read, "Mark Chen, Sales Representative, Re/Max Realtron Realty, Inc." The CHS identified this photograph as the man she knows as "Mark." The phone number 416-732-4321 and email address markztchen@yahoo.ca were also listed. An FBI Linguist translated the webpage and further discovered next to the name "Mark Chen" it stated, "Chen Zong Tao." The CHS then navigated to "Mark Chen's" WeChat contact card in the CHS's phone.

22. Each WeChat account has a user profile image associated with it. "Mark's" contact card contained a profile image of a red/orange, yellow colored flower. There were two phone numbers listed for this contact: 416-732-4321 and 347-594-5090.

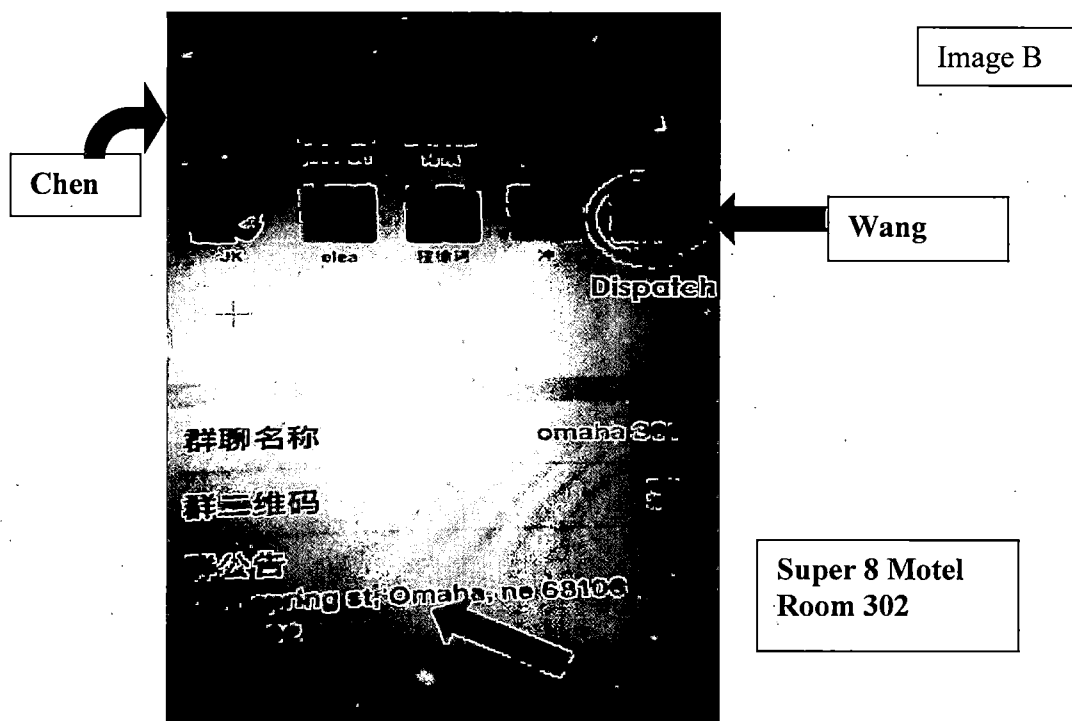
23. "Mark" texted the CHS the following websites to use to post advertisements for prostitution: www.adultsearch.com, www.skipthegames.com, and www.adlist24.com. While working as a dispatcher, the CHS learned that "Mark" uses the website "supermatchescort.com" to advertise. On the website "supermatchescort.com", an email address of supermatchescort@gmail.com is listed.

24. Through subpoena returns the subscriber for the email address supermatchescort@gmail.com is Zongtao Chen. Other emails associated to Chen are as follows: markztchen@yahoo.ca, markzongtaochen@gmail.com, and chen_zong_tao@hotmail.com.

25. On May 31, 2018, the CHS navigated to a group conversation within WeChat. Within the group chat, was the profile image, a red/orange and yellow flower, which was the same as the contact card the CHS showed me for ‘Mark.’ In the conversation next to the flower profile image was an advertisement. The advertisement was translated as, “Sincerely hiring/requesting female phone operator who knows computers, patient, hardworking, responsible, contact via WeChat.” (see Image A)



26. The CHS explained each brothel location (apartment and/or hotel) that is operated by “Mark” has a WeChat group. Within each group, a dispatcher is paired up with a provider. The CHS identified a WeChat group that is associated with a brothel operating out of a hotel in Omaha, Nebraska. (see Image B)



Within this WeChat group there are approximately ten different people. Each person has their own profile image. This Omaha WeChat group also includes “Mark’s” profile image. The CHS stated that “Mark” monitors the numerous WeChat groups associated with the STO. The CHS stated that, Yan Wang, who lives in the Los Angeles area, is currently working as a dispatcher for “Mark.” The CHS identified Wang’s WeChat profile image within the Omaha group. The CHS worked as a dispatcher in 2017 with Wang in California. While working as dispatchers, the CHS and Wang shared the same Apple iCloud and Store accounts. The email address that was associated to the Apple iCloud account was “redmoon9d@gmail.com.”

27. On June 27, 2018, the CHS provided a screenshot of a photo of a silver Mazda bearing California tag 8AIV928. The CHS identified this vehicle as Wang’s. The photograph has a time stamp of May 11 5:54 p.m. (no year)

28. I know through a search of law enforcement databases the following about Yan Wang: subscribes to phone numbers (562) 988-4830 and (891) 653-1911, registered vehicle 2012 Mazda bearing California tag 8AIV928, address on W 12th Street, Pomona, California.

Folkspost

29. On July 3, 2018, the CHS provided a photograph s/he received via the iCloud account shared with Wang. I reviewed the picture which was screenshot of a conversation that occurred on June 5, 2018, between Yan Wang and Mark Chen. In this screenshot Chen sends the following to Wang, "folkspost.com/appt, User: lover, and Password: 6362872242." Wang replies with a screenshot of a color coded calendar. At the top of the calendar it reads, "Folkspost Online...." The CHS said that "Mark's" dispatchers use a computer to answer the customer's phone calls and enters the "dates."

30. On July 13, 2018, I executed a search warrant to Apple for the iCloud account: redmoon9d@gmail.com (the email address linked to the iCloud account). On July 24, 2018, Apple returned the search warrant results. Within the iCloud pictures folder was a screenshot of a text message between Wang and Chen. This screenshot was the same as the screenshot mentioned in the above paragraph. Chen sends the following to Wang, "folkspost.com/appt, User: lover, and Password: 6362872242." Wang replies with a screenshot of a color coded calendar. At the top of the calendar it reads, "Folkspost Online...." Also within the pictures folder is an image of a screenshot with the main webpage, www.folkspost.com displayed. Within that webpage the year "2012" appears and a space to log in with a username and password.

31. On December 4, 2018, a search warrant return to DreamHost, 818 West Seventh

St, Suite 930, Los Angeles, CA 90017 for the content of folkspost.com was received. A review of the return revealed that the dispatcher for the STO uses “folkspost.com.” as an online booking system. Within the system, a user can sort the data by year, month, day, city, or a specific provider. The booking system also contains a “client” database which appears to contain the customer’s phone numbers. (Image V is an overview of the “dates” for the year 2018 and Image W is a drop down menu available to search by Country/City/Provider.)

The screenshot displays a web-based booking system interface. At the top, there is a navigation bar with a 'Year' dropdown menu on the left, a 'Welcome admin' message on the right, and a search bar in the center. Below the navigation bar, the main content area shows a calendar grid for the year 2018. The grid is organized into four columns, each representing a different provider or location. Each column contains a grid of days (1-31) and a corresponding grid of booking slots. The booking slots are represented by small black squares, indicating booked dates. The interface is designed for administrative use, allowing users to manage bookings for different providers and locations.

Image V

Brand New World
Brand New World
Australia
Brisbane
Brisbane Jenny
Melbourne
Melbourne Jenny
Sydney
Sydney amy
Canada
Alberta
Calgary
calgary NE Bobo
Calgary NE Yoyo
calgary sw(DT)
Edmonton
Edmonton Leah
Edmonton South Amy
Edmonton South Vivian
Fort McMurray

Image W

The client database is “searchable” by phone numbers. The clients phone number and number of visits are listed. (see Image X)

Welcome admin

Edit Clients

Select Client <-> Brand New World

PPPPPPPP 1-5

Secure number:

Client Name:

EMAIL:

Type: ☐ Normal ☐ Mail NA

Register Client

Page 1/1079 Total Clients: 10794

Phone Number	Name	Visit Status
33207268	PP	✓
7897164	PP	✓
406114317	PP	✓
31431112	PP	✓
64034712	PP	✓
31242602	PP	✓
47405115	PP	✓
2051256	PP	✓
4217515	PP	✓
65255154	PP	✓
470274711	PP	✓
61644456	PP	✓
80413133	PP	✓
64812115	PP	✓
16547100	PP	✓
915344015	PP	✓
918342104	PP	✓

Image X

Each date is color coded and viewed in the calendar as such: the time, the customer's phone

number, the city, the provider, and the dispatcher. (Image Y)



Image Y

After the date is made, it is the responsibility of the dispatcher to notify the provider, usually via the WeChat group. (Image Z is an overview of the first week in April 2018 of “dates”)

[illegible]

Image Z

32. On April 30, 2018, a cash withdrawal of \$300.00 was made from Wang's husbands Wells Fargo account ending in x1033. Bank surveillance footage showed Yan Wang at the drive thru ATM (Wells Fargo, 32881 US HWY 79. Temecula, CA, 92592) in a Mazda vehicle with license plate number 8AIV928. Wang is not a co-signer on her husband's account. (see Image C and D)



Image C

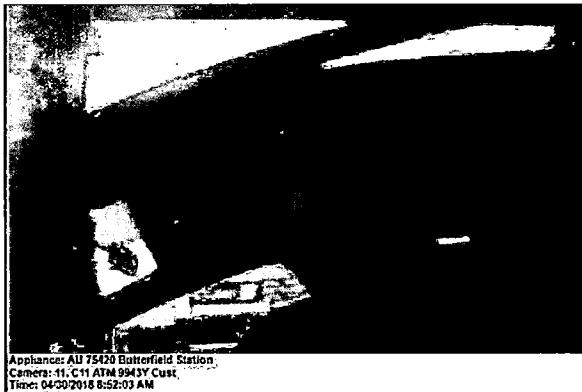


Image D

33. Between April 10, 2018, and June 26, 2018, twelve transactions were captured on bank surveillance footage for Bank of America account ending in x5100. Both Gotti Cheng and Yan Wang are signors on this account. Eleven of the twelve transactions were cash deposits totaling \$8,600.00. The other transaction was a \$500.00 cash withdrawal on April 25, 2018. On this date, bank surveillance footage showed both Gotti Cheng and Yan Wang at a Bank of

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America teller window. Also on April, 25, 2018, two online banking transfers occurred that transferred \$640.00 from Yan Wang's Bank of America account ending in x3255 to the joint account at Bank of America ending in x5100. (see image E and F)



Image E



Image F

34. On September 16, 2018, the CHS spoke with Wang. Wang told the CHS that Wang was still answering phones, but will no longer be answering phones for the St. Louis area. Wang would not tell the CHS where she would be answering phones and said different states make good money. Wang stated she does not use her iCloud account anymore because it is not

safe and someone might find out where she is located. She said the computer was much safer to use.

35. On December 18, 2018, the CHS confirmed that Wang's cell phone number is (562) 388-4830 and that Wang still uses that number along with several others.

36. In my training and experience, I have learned that the Providers are companies that provides cellular telephone access to the public. I also know that providers of cellular telephone service have technical capabilities that allow them to collect and generate at least two kinds of information about the locations of the cellular telephones to which they provide service: (1) E-911 Phase II data, also known as GPS data or latitude-longitude data, and (2) cell-site data, also known as "tower/face information" or cell tower/sector records. E-911 Phase II data provides relatively precise location information about the cellular telephone itself, either via GPS tracking technology built into the phone or by triangulating on the device's signal using data from several of the provider's cell towers. Cell-site data identifies the "cell towers" (i.e., antenna towers covering specific geographic areas) that received a radio signal from the cellular telephone and, in some cases, the "sector" (i.e., faces of the towers) to which the telephone connected. These towers are often a half-mile or more apart, even in urban areas, and can be 10 or more miles apart in rural areas. Furthermore, the tower closest to a wireless device does not necessarily serve every call made to or from that device. Accordingly, cell-site data is typically less precise than E-911 Phase II data.

37. Based on my training and experience, I know that the Provider(s) can collect E-

911 Phase II data about the location of the Target Cell Phones, including by initiating a signal to determine the location of the Target Cell Phones on Providers' network or with such other reference points as may be reasonably available.

38. Based on my training and experience, I know that the Provider(s) can collect cell-site data about the Target Cell Phones, including the information requested in Attachment B.

Conclusion

39. I believe that Yan Wang is, to varying degrees, a member of the criminal organization that is engaged in an ongoing criminal conspiracy to knowingly transport individuals in interstate and foreign commerce with intent that such individuals engage in prostitution, or in any sexual activity for which any person can be charged with a criminal offense, in violation of Title 18 United States Code, Sections 2, 371, 1952, and 2421. I have probable cause that Yan Wang is coordinating the providers with the dates and collecting a portion of the proceeds derived from commercial sex acts that others have engaged in. I also believe that being able to track the **Target Cell Phone** will help us develop and find additional evidence of the ongoing criminal activities of the group, to include the location of places where members of the organization are, as well as the identities of other members of this organization, to include others organizing the date, engaging in commercial sex acts for the organization and those who are managing them and collecting money from them, as well as those who patronize this organization. I believe that being able to track the **Target Cell Phone** will also lead us to find contraband, fruits of the criminal activity (to include money), items illegally possessed, and property designed for use, intended for use and being used in the commission of the ongoing criminal activities.

40. Based on the foregoing, I request that the Court issue the proposed search warrants, pursuant to Federal Rule of Criminal Procedure 41 and 18 U.S.C. § 2703(c). I further request that the Court authorize execution of the warrants at any time of day or night, owing to the potential need to locate the Target Cell Phone outside of daytime hours.

41. I further request that the Court direct Provider(s) to disclose to the government any information described in Attachment B that is within the possession, custody, or control of Provider(s). I also request that the Court direct the Provider(s) to furnish the government all information, facilities, and technical assistance necessary to accomplish the collection of the information described in Attachment B unobtrusively and with a minimum of interference with Providers' services, including by initiating a signal to determine the location of the Target Cell Phones on Providers' network or with such other reference points as may be reasonably available, and at such intervals and times directed by the government.

42. Prior to being submitted to the Court, this affidavit, the accompanying application, and the requested search warrant were all reviewed by Assistant United States Attorney (AUSA) Scott Kerin and AUSA Kerin advised me that in his opinion the affidavit and application are legally and factually sufficient to establish probable cause to support the issuance of the requested warrant.

Request for Delaying Notice

43. I further request, pursuant to 18 U.S.C. § 3103a(b) and Federal Rule of Criminal Procedure 41(f)(3), that the Court authorize the officer executing the warrant to delay notice until 30 days after the collection authorized by the warrant has been completed. This delay is justified because there is reasonable cause to believe that providing immediate notification of the warrant

may have an adverse result, as defined in 18 U.S.C. § 2705. Based upon my knowledge, training, and experience, it is my belief that providing immediate notice to subscriber or user of the Target Cell Phones may result in (include all of the following that apply: the endangerment of the life or physical safety of an individual, flight from prosecution, the destruction of or tampering with evidence, intimidation of potential witnesses, and/or otherwise seriously jeopardize an investigation). See 18 U.S.C. § 3103a(b)(1). As further specified in Attachment B, which is incorporated into the warrant, the proposed search warrant does not authorize the seizure of any tangible property. See 18 U.S.C. § 3103a(b)(2). Moreover, to the extent that the warrant authorizes the seizure of any wire or electronic communication (as defined in 18 U.S.C. § 2510) or any stored wire or electronic information, there is reasonable necessity for the seizure for the reasons set forth above. See 18 U.S.C. § 3103a(b)(2).

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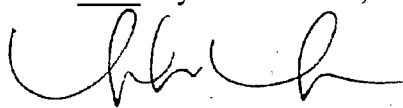
Request for Sealing

44. I further request that this Court issue an order sealing, until further order of the Court, all papers submitted in support of the requested search warrants, including the application, this affidavit, the attachments, and the requested search warrants. I believe that sealing these documents is necessary because the information to be seized is relevant to an ongoing investigation, and any disclosure of the information at this time may endanger the life or physical safety of an individual, cause flight from prosecution, cause destruction of or tampering with evidence, cause intimidation of potential witnesses, or otherwise seriously jeopardize an investigation. Premature disclosure of the contents of the application, this affidavit, the attachments, and the requested search warrants may adversely affect the integrity of the investigation.

Sworn via telephone pursuant to Fed.R.Crim.P. 4.1 on
12/27/2018 at 5:09 pm. - YYY

June Piniewski
Federal Bureau of Investigation

SUBSCRIBED and SWORN to telephonically before me this 28th day of December, 2018.



Honorable Youlee Yim You
United States Magistrate Judge

ATTACHMENT A

Property to Be Searched

1. The cellular telephone assigned call number (562) 388-4830 (hereinafter "Target Cell Phone"), whose wireless service provider is Sprint (wireless provider), a company headquartered at 6480 Sprint Parkway Overland Park, KS 66251.
2. Information about the location of the Target Cell Phone that is within the possession, custody, or control of Sprint.

ATTACHMENT B

Particular Things to Be Seized

I. Information to Be Disclosed by Sprint (hereinafter "Provider")

A. To the extent that information associated with (562) 388-4830 (hereinafter "Account") is within the possession, custody, or control of the Provider, including any information that has been deleted but is still available to the Provider, the Provider is required to disclose to the government the following information pertaining to the Account listed in Attachment A for the time period June 27, 2018 to the date of the execution of the search warrant:

1. The following information about the customers or subscribers of the Account:
 - a. Names (including subscriber names, user names, and screen names);
 - b. Addresses (including mailing addresses, residential addresses, business addresses, and e-mail addresses);
 - c. Local and long distance telephone connection records;
 - d. Records of session times and durations, and the temporarily assigned network addresses (such as Internet Protocol ("IP") addresses) associated with those sessions;
 - e. Length of service (including start date) and types of service utilized;
 - f. Telephone or instrument numbers (including MAC addresses, Electronic Serial Numbers ("ESN"), Mobile Electronic Identity Numbers ("MEIN"), Mobile Equipment Identifier ("MEID"); Mobile Identification Number ("MIN"), Subscriber Identity Modules ("SIM"), Mobile Subscriber Integrated Services Digital Network Number ("MSISDN"); International

Mobile Subscriber Identity Identifiers (“IMSI”), or International Mobile Equipment Identities (“IMEI”);

g. Other subscriber numbers or identities (including the registration Internet Protocol (“IP”) address); and

h. Means and source of payment for such service (including any credit card or bank account number) and billing records.

2. All records and other information (not including the contents of communications) relating to the Account, including:

a. Records of user activity for each connection made to or from the Account, including log files; messaging logs; the date, time, length, and method of connections; data transfer volume; user names; and source and destination Internet Protocol addresses;

b. Information about each communication sent or received by the Account, including the date and time of the communication, the method of communication, and the source and destination of the communication (such as source and destination email addresses, IP addresses, and telephone numbers);

c. All data about which “cell towers” (i.e., antenna towers covering specific geographic areas) and “sectors” (i.e., faces of the towers) received a radio signal from each cellular telephone or device assigned to the Account; and

d. All historical geo-location services/global positioning system (GPS) data/enhanced 911 (E911) records including any available ranging data [distance from tower, range to tower (PCMD/RTT/REVEAL/Historic

MLTs, TrueCall, TDOA or Timing Advance Information or other similar un-named records held by the Provider)] which may be available to the Provider.

II. Information to Be Seized by the Government for Section I

All information described above in Section I that constitutes evidence, fruits, and instrumentalities of violations of Title 18, United States Code, Sections 2, 371, 1952, and 2421, for the time period of June 27, 2018 to the date of the execution of the search warrant, for the Account(s) listed in Attachment A.

III. Information to be Disclosed by Provider for a Prospective Thirty-Day Period

A. All information about the location of the Target Cell Phone described in Attachment A for a period of thirty days from the date on which data is first acquired under this search warrant, during all times of day and night, and the status of the device and the account associated with the device (i.e., whether the device is active or operational and whether the account is in good standing, canceled, suspended, etc.). "Information about the location of the Target Cell Phone" includes all available E-911 Phase II data, GPS data, latitude-longitude data, and other precise location information, as well as all data about which "cell towers" (i.e., antenna towers covering specific geographic areas) and "sectors" (i.e., faces of the towers) received a radio signal from the cellular telephone described in Attachment A.

B. To the extent that the information described in the previous paragraph (hereinafter, "Location Information") is within the possession, custody, or control of Sprint (hereinafter "Provider"), Provider is required to disclose the Location Information to the

government. In addition, Provider must furnish the government all information, facilities, and technical assistance necessary to accomplish the collection of the Location Information unobtrusively and with a minimum of interference with Provider's services, including by initiating a signal to determine the location of the Target Cell Phone on Provider's network or with such other reference points as may be reasonably available, and at such intervals and times directed by the government. The government shall compensate Provider for reasonable expenses incurred in furnishing such facilities or assistance.

C. This warrant does not authorize the seizure of any tangible property. In approving this warrant, the Court finds reasonable necessity for the seizure of the Location Information.

See 18 U.S.C. § 3103a(b)(2).